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Re:

Request for Information Pursuant to Section 104(e) of CERCLA

for Himco Dump in Elkhart, Indiana

Dear Sir or Madam:

This letter seeks your cooperation in providing information and documents relating to the contamination of the Himco Dump Superfund Site in Elkhart Indiana. A Superfund site is a site contaminated with hazardous substances that may present a threat to human health or the environment.

The United States Environmental Protection Agency (U.S. EPA) is investigating the release or threat of release of hazardous substances, pollutants or contaminants at the Himco Dump Site. The U.S. EPA is seeking information concerning the generation, storage, treatment, transportation, and disposal methods of hazardous substances that have been, or threaten to be, released from the Site, as well as financial information for potentially responsible parties. In addition, U.S. EPA will identify activities, materials and parties that contributed to contamination at the Site. The U.S. EPA believes that you ("the Respondent") possess information which may assist the Agency in its investigation of the Site. Enclosure 1 is the Information Request.

We encourage you to give this matter your immediate attention. Please provide a complete and truthful response to this Information Request and its questions in Enclosure 1 within 10 days of your receipt of this letter. Instructions to guide you in the preparation of your response are in Enclosure 3. Definitions of the terms used in this Information Request and in the questions are in Enclosure 4.

You may consider *confidential* the information that U.S. EPA is requesting. Under CERCLA you may not withhold information on that basis, but you may ask U.S. EPA to treat the information as confidential. To request that the Agency treat your information as confidential, you must follow the procedures outlined in Enclosure 4, including the requirement that you support your claim for confidentiality.

We make this request under the federal **Superfund** law (the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. Section 9601, et seq., commonly referred to as **CERCLA** or **Superfund**). The Superfund law gives U.S. EPA the authority to assess the threats to human health and the environment posed by contaminated sites and to clean-up those sites. Under Section 104(e)(2) of CERCLA, 42 U.S.C. Section 9604 (e)(2), the U.S. EPA has information-gathering authority that allows the Agency to require persons and corporations to furnish information or documents. Enclosure 6 is a summary of the legal authority.

Compliance with this Information Request is mandatory. The Superfund statute provides that failure to answer the questions fully and truthfully, and within the prescribed time frame, can result in an enforcement action and penalties. Other statutes provide that the submission of false, fictitious statements or misrepresentations can result in sanctions.

The U.S. EPA has the authority to use the information that it requests in an administrative, civil or criminal action.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. section 3501 et seq.

Return your response to U.S. EPA within 10 days of receipt to:

Larry L. Johnson U.S. Environmental Protection Agency 77 West Jackson Boulevard, C-14J Chicago, Illinois 60604

If you have any legal questions, please call Larry L. Johnson, our attorney at (312) 886-6609.

We appreciate your assistance and look forward to your prompt response to this Information Request.

Sincerely,

Janice Loughlin, Chief Section 3, Multi-Media Branch II Office of Regional Counsel

Enclosures:

- 1. Additional Questions and Document Request
- 2. Original Questions
- 3. Instructions
- 4. Definitions
- 5. Confidential Business Information
- 6. Description of Legal Authority
- 7. Supplemental Information for Small Businesses



cc. Miriam L. Chesslin-U.S. Department of Justice

bcc: G. Watts, EPS, RESS

G. Massenburg, RPM, RRB2

L. Johnson, Atty., ORC

Dec Miriam Chewlen, DOJ

ADDITIONAL QUESTIONS AND DOCUMENT REQUESTS

- 1. Provide all correspondence, work papers and other documents related to the estimated insurance recovery in the amount of \$1,500,000 shown on the Waste Away Companies December 31, 2004 combined balance sheet including but not limited to (a) the name of the insurance company (or companies) from whom the recovery is expected and (b) the basis for the assumption that the recovery will take four years.
- 2. Explain the apparent inconsistency in the booking of the estimated insurance recovery referred to in No. 1 above and the response to question No. 17 of the May 13, 2005 104(e) request related to environmental insurance which states in part "Coverage under these policies for environmental claims related to the landfill operated by Chas. Himes & Sons and Miles Laboratories, Inc. has been denied by the carriers."
- 3. Explain the apparent inconsistency between the statement in Note 6 on page 18 of the December 31, 2004 Waste-Away Companies Combined Financial Statements which states in part "Management and legal counsel believe Himco has insurance coverages related to this environmental matter." and the response to question No. 17 of the May 13, 2005 request related to environmental insurance which states in part "Coverage under these policies for environmental claims related to the landfill operated by Chas. Himes & Sons and Miles Laboratories, Inc. has been denied by the carriers."
- 4. For each insurance policy identified in response to question No. 17 of the May 13, 2005 request, provide (a) all correspondence related to requests for coverage under the policies, (b) all correspondence from each company denying coverage as stated in the response, and (c) identify any ongoing efforts to obtain coverage under each policy.
- 5. Explain and provide documentation related to the bad debt in the amount of \$3,808,763 on the December 31, 2001 Himco income statement, including but not limited to (a) the name of the debtor, (b) the nature of the goods or services provided which gave rise to the debt, (c) the reasons the debt was deemed uncollectible and (d) the efforts made to collect the debt.
- 6. Describe the nature of the Land & Improvements in the amount of \$54,052 which appears in the Himco column of the December 31, 2001 and December 31, 2004 balance sheets. If this in fact land, explain why in response to question No. 8 of the May 13, 2005 request it was asserted that "Himco Waste-Away Service, Inc. does not now nor has it ever owned any real property".
- 7. Describe the nature of the transactions which resulted in the inter-company loans receivable in the amount of \$19,074,395 on the Himco balance sheet as of December 31, 2004.
- 8. Describe the nature of the transactions which resulted in the inter-company loans payable in the amount of \$20,453,575 on the Himco balance sheet as of December 31, 2004.

- 9. Explain for each and every type of transaction between Himco and any other company which is part of the Waste Away Group how the cost for such type of transaction is established, including but not limited to (a) who established the rate, (b) the basis for the rate, (c) provisions to adjust the rate as necessary and (d) whether each such rate was at fair market value and if so, how that determination was made.
- 10. Explain and provide documentation for each year from 2000 through 2004 for the calculation of Allocation Expense appearing on the income statement of each of the Waste Away companies, including but not limited to (a) the identification of the company incurring the allocated expenses, (b) the category and amount of each expenses being allocated, (c) the total expenses being allocated, (d) the allocation method used and (e) the calculation of the amount of Allocated Expense charged to each Waste Away company.
- 11. On the Waste Away Group, Ltd. consolidated income statement for the twelve months ended December 31, 2001, explain why a total of \$6,150,038 was allocated to the other Waste Away companies, resulting in net income to Waste Away Group, Ltd. of \$4,543,407.
- 12. Identify the source and/or the calculation used to arrive at Himco Waste-Away's December 31, 2004 deficit net worth of \$1,654,000 as reported in response to as reported in response to question No.18 of the May 13,2005 request, and provide a reconciliation of that amount to the net worth deficit of \$2,044.6 \text{ reported in the Himco column of the December 31, 2004 consolidated balance sheet provided in response to question No.2 of the May 13, 2005 104(e) request.

More

ORIGINAL QUESTIONS

- 1. For the last five fiscal years, provide copies of federal corporate income tax returns file along with all supporting schedules filed.
- 2. For the last five fiscal years, provide internal financial statements such as the balance sheets, statement of operations, statement of source and application of funds or cash flows, statement of retained earnings, and income statements, with all comments attached.
- 3. For the last five fiscal years, provide any audit reports and all accompanying accountant's notes.
- 4. For the last five fiscal years, provide a list of every tangible asset that has or originally had a value of \$10,000 or more and, detailed asset by asset, its corresponding accumulated depreciation schedule or amortization or intangibles relating to those assets.
- 5. For the last five fiscal years, provide a list of the names and addresses of all financial institutions, including banks, savings and loans, credit unions, brokerage houses, stock funds, mutual fund companies, investment companies, and bonding companies with which Respondent has had an account of a value of \$10,000 or more. For each financial institution, list every account number, the type of asset and the account's current value.
- 6. For the last five fiscal years, provide a detailed schedule of bank loans payable and all other loans payable. For each loan listed provide the name and address of the lending institution, the original amount borrowed, terms of the loan, due date, amortization schedule, any restriction, balance now due, and the financing statements submitted with the original loan application. Provide this information for all loans from individuals or entities other than financial institutions. Also, provide permission for U.S. EPA to secure a copy of the loan application and supporting documentation from the lending institution.
- 7. Provide copies of all loan applications and financing statements filed in support of any lien placed on equipment or property during the last five years.
- 8. Provide a list of the address, fair market value, legal descriptions and property identification or tax number of all real estate and property owned, optioned or leased. For each property listed state the amount of any remaining mortgage; the original mortgage amount; the mortgage holder and its address; the basis for the market value estimate and the amount of last year's tax on the property. For each mortgaged property, provide a copy of the mortgage application and supporting documentation and, also, permission for U.S. EPA to secure a copy of the loan application from the lending institution. (Note that this question includes all refinancing activity on the enumerated properties.)
- 9. Identify any parent corporation and all subsidiaries of the Respondent.

- 10. Provide a copy of the corporate charter and the articles of incorporation.
- 11. Identify any individuals and entities which own 5% or more of the stock.
- 12. Specify whether Himco Waste-Away Service, Inc. is a publicly held corporation or a privately held corporation. If publicly held, identify the stock exchange on which it is listed.
- 13. Identify the officers of Himco Waste-Away Service, Inc. by name and title. Identify all members of the board of directors. If change occurred during the preceding 5 years, identify the former incumbents, their offices, and dates of change.
- 14. For the last five fiscal years, provide a copy of all annual reports prepared and submitted to any state and/or federal government and/or regulatory authority.
- 15. Himco Waste-Away Service, Inc. has had any changes in corporate name, ownership or structure or has obtained an interest in or dissolved itself of an interest in any other corporation, subsidiary, division or other entity, identify each such transaction. State if the transaction consisted of a merger, consolidation, sale or transfer of assets and submit all documents related to such transaction including all documents pertaining to any agreements, for the purchasing corporation to assume the liabilities of the selling corporation.
- 16. Produce all documents or records describing the corporate or other legal relationships between HimcoWaste-Away Service, Inc., Charles H. Himes, Jr., and Charles Himes & Sons.
- 17. Identify all environmental insurance policy coverage information and provide copies of all such policies.
- 18. If Himco Waste-Away Service, Inc. asserts that it is financially not able to contribute to the payment of clean-up costs at the Himco Dump Site, so state. Provide information in narrative form supported with financial computations in explanation of this assertion. Reference the tax returns and financial records submitted in response to preceding questions.

INSTRUCTIONS

- 1. Answer each of the questions in this Information Request separately.
- 2. Precede each answer with the number of the question to which it corresponds.
- 3. In answering each question, identify all persons and contributing sources of information.
- 4. Although the U.S. EPA seeks your cooperation in this investigation, CERCLA requires that you respond fully and truthfully to this Information Request. False, fictitious, or fraudulent statements or misrepresentations may subject you to civil or criminal penalties under federal law. Section 104 of CERCLA, 42 U.S.C. Section 9604, authorizes the U.S. EPA to pursue penalties for failure to comply with that Section, or for failure to respond adequately to requests for submissions of required information.
- 5. You must supplement your response to U.S. EPA if, after submission of your response, additional information should later become known or available. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify U.S. EPA as soon as possible.
- 6. For any document submitted in response to a question, indicate the number of the question to which it responds.
- 7. You must respond to each question based upon all information and documents in your possession or control, or in the possession or control of your current or former employees, agents, contractors, or attorneys. Information must be furnished regardless of whether or not it is based on your personal knowledge, and regardless of source.
- 8. Your response must be accompanied by the following statement, or one that is substantially equivalent:

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The individual who prepared the response or the responsible corporate official acting on behalf of the corporation must sign and date the statement, affidavit, or certification. Include the corporate official's full title.

- 9. If any of the requested documents have been transferred to others or have otherwise been disposed of, identify each document, the person to whom it was transferred, describe the circumstances surrounding the transfer or disposition, and state the date of the transfer or disposition.
- 10. All requested information must be provided notwithstanding its possible characterization as confidential information or trade secrets. If desired, you may assert a business confidentiality claim by means of the procedures described in Enclosure 5.

DEFINITIONS

- 1. As used in this letter, words in the singular also include the plural and words in the masculine gender also include the feminine and vice versa.
- 2. The term *person* as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
- 3. *The Site* referenced in these documents shall mean the Himco Dump located in LaSalle, Illinois.
- 4. The term *hazardous substance* shall have the same definition as that contained in Section l0l(l4) of CERCLA, including any mixtures of such hazardous substances with any other substances, including petroleum products.
- 5. The term, *pollutant* or *contaminant*, shall have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances.
- 6. The term *release* shall have the same definition as that contained in Section 101(22) of CERCLA, and means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance, pollutant, or contaminant.
- 7. The term *identify* means, with respect to a natural person, to set forth the person's full name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
- 8. The term *identify* means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
- 9. The term *identify* means, with respect to a document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
- 10. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R., Part 300 or 40 C.F.R., Part 260-280, in which case, the statutory or regulatory definitions shall apply.

CONFIDENTIAL BUSINESS INFORMATION

You may consider some of the information confidential that the U.S. Environmental Protection Agency (U.S. EPA or Agency) is requesting. You cannot withhold information or records upon that basis. The Regulations at 40 C.F.R. Part 2, Section 200 *et seq* require that the U.S. EPA affords you the opportunity to substantiate your claim of confidentiality before the Agency makes a final determination on the confidentiality of the information.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. 2.203(b). Information covered by such a claim will be disclosed by the U.S. EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. [See 41 Federal Register 36902 et seq. (September 1, 1976); 43 Federal Register 4000 et seq. (December 18, 1985)]. If no such claim accompanies the information when the U.S. EPA receives it, the information may be made available to the public by the Agency without further notice to you. Please read carefully these cited regulations, together with the standards set forth in Section 104(e)(7) of Comprehensive Environmental Response Compensation Liability Act (CERCLA), because, as stated in Section 104(e)(7) (ii), certain categories of information are not properly the subject of a claim of confidential business information.

If you wish the U.S. EPA to treat the information or record as "confidential", you must advise the U.S. EPA of that fact by following the procedures described below, including the requirement for supporting your claim of confidentiality. To assert a claim of confidentiality, you must specify which portions of the information or documents you consider confidential. Please identify the information or document that you consider confidential by page, paragraph, and sentence. You must make a separate assertion of confidentiality for each response and each document that you consider confidential. Submit the portion of the response that you consider confidential in a separate, sealed envelope. Mark the envelope "confidential", and identify the number of the question to which it is the response.

For each assertion of confidentiality, identify:

- 1. The period of time for which you request that the Agency consider the information confidential, e.g., until a specific date or until the occurrence of a specific event;
- 2. The measures that you have taken to guard against disclosure of the information to others;
- 3. The extent to which the information has already been disclosed to others and the precautions that you have taken to ensure that no further disclosure occurs;
- 4. Whether the U.S. EPA or other federal agency has made a pertinent determination on the confidentiality of the information or document. If an agency has made such a determination, enclose a copy of that determination;

- 5. Whether disclosure of the information or document would be likely to result in substantial harmful effects to your competitive position. If you believe such harm would result from any disclosure, explain the nature of the harmful effects, why the harm should be viewed as substantial, and the causal relationship between disclosure and the harmful effect. Include a description of how a competitor would use the information;
- 6. Whether you assert that the information is <u>voluntarily submitted</u> as defined by 40 C.F.R. 2.201(I). If you make this assertion, explain how the disclosure would tend to lessen the ability of the U.S. EPA to obtain similar information in the future; and
- 7. Any other information that you deem relevant to a determination of confidentiality.

Please note that pursuant to 40 C.F.R. 2.208(e), the burden of substantiating confidentiality rests with you. The U.S. EPA will give little or no weight to conclusory allegations. If you believe that facts and documents necessary to substantiate confidentiality are themselves confidential, please identify them as such so that the U.S. EPA may maintain their confidentiality pursuant to 40 C.F.R. 2.205(c). If you do not identify this information and documents as "confidential", your comments will be available to the public without further notice to you.

DESCRIPTION OF LEGAL AUTHORITY

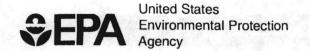
The federal Superfund law (the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. Section 9601, et seq. (commonly referred to as **CERCLA** or **Superfund**) gives U.S. EPA the authority to, among other things: 1) assess contaminated sites, 2) determine the threats to human health and the environment posed by each site, and, 3) clean up those sites.

Under Section 104(e)(2) of CERCLA, 42 U.S.C. Section 9604 (e)(2), U.S. EPA has broad information gathering authority which allows U.S. EPA to require persons to furnish information or documents relating to:

- A. The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility, or transported to a vessel or facility;
- B. The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at/or from a vessel or facility;
- C. The ability to pay the costs of the clean-up.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to each question within this Information Request and within the prescribed time frame can result in an enforcement action by U.S. EPA pursuant to Section 104(e)(5) of CERCLA. This Section also authorizes an enforcement action with similar penalties if the recipient of the Request does not respond and does not justify the failure to respond. Other statutory provisions (18 U.S.C. Section 1001) authorize separate penalties if the responses contain false, fictitious or fraudulent statements. The U.S. EPA has the authority to use the information requested in this Information Request in an administrative, civil or criminal action.

SUPPLEMENTAL INFORMATION FOR SMALL BUSINESSES



Office of Enforcement and Compliance Assurance

INFORMATION SHEET

U.S. EPA Small Business Resources

f you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (http://www.epa.gov/sbo) is a good place to start because it links with many other related websites. Other useful websites include:

EPA's Home Page http://www.epa.gov

Small Business Assistance Programs http://www.epa.gov/ttn/sbap

Compliance Assistance Home Page http://www.epa.gov/oeca/oc

Office of Site Remediation Enforcement http://www.epa.gov/oeca/osre

Hotlines, **Helplin**es and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

EPA's Small Business Ombudsman (800) 368-5888

Hazardous Waste/Underground Tanks/ Superfund (800) 424-9346

National Response Center (to report oil and hazardous substance spills) (800) 424-8802

Toxics Substances and Asbestos Information (202) 554-1404

Safe Drinking Water (800) 426-4791

Stratospheric Ozone and Refrigerants Information (800) 296-1996

Clean Air Technical Center (919) 541-0800 Wetlands Hotline (800) 832-7828

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Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

Metal Finishing (1-800-AT-NMFRC or www.nmfrc.org)

Printing (1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair (1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture (1-888-663-2155 or www.epa.gov/oeca/ag)

Printed Wiring Board Manufacturing (1-734-995-4911 or www.pwbrc.org)

The Chemical Industry (1-800-672-6048 or www.chemalliance.org)

The Transportation Industry (1-888-459-0656 or www.transource.org)

The Paints and Coatings Center (1-800-286-6372 or www.paintcenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at http://www.smallbizenviroweb.org/state.html.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (http://www.epa.gov/oeca/auditpol.html) and the Small Business Policy (http://www.epa.gov/oeca/

smbusi.html). These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.

Himco Waste-Away Services Inc. c/o Charles Himes, Jr. 1224 Strong Avenue Elkhart, IN 46514

Richard W. Paulsen, Esq.
Atty-for-Himco Waste-Away Services, Inc.
Barnes & Thornburgh
Bank One Bldg., Suite 200
121 West Franklin Street
Elkhart, IN 46516

HIMCO DUMP PRPs RD/RA MEETING SIGN IN SHEET

FRIDAY, DECEMBER 17, 2004

NAME	COMPANY	TELEPHONE NUMBER
Gwen Massenburg	LS EPA	312-886-0983
Jessica Fliss (199)		317 233-2823
Minan (Mini) Chealin	VS.DOT	202-514-1491
Larry L. Johnson	U.S.EDA	312-886-6609
Lindsay Wolter	Seyfarth Shaw	312-269-8827
W.C. Blanton	Placemell Souders	816-683-8121
Dick Paulen	Ponenes & Thornburg	574-293-0681
Jerry Wayward	Nykena Gossett	(312) 627-2185
REED OSLAN	Kirklano & Ellisle?	312 861-2166